

REMARKS

Claims 1 and 3-17 are pending in this application. By this Amendment, 1, 9 and 14-17 are amended, and claim 2 is canceled, without prejudice to, or disclaimer of, the subject matter recited therein. Support for amendments to the claims 1, 9 and 14-17 can be found in the original claim 2. Thus, no new matter is added.

The courtesies extended to Applicant's representatives by Examiner Tyler and Examiner Poon at the personal interview held on November 20, 2007, are appreciated. The reasons presented at the interview as warranting favorable action are incorporated into the remarks below and constitute Applicant's record of the interview.

I. The Claims Define Patentable Subject Matter

A. §102(b) Rejection of Claims 1, 2, 4, 5, 6, 9-12 and 14-17

Claims 1, 2, 4-6, 9-12 and 14-17 are rejected under 35 U.S.C. §102(b) over JP 10-208034 A to Kuwata et al. ("Kuwata"). The rejection of canceled claim 2 is moot, and the rejection of claims 1, 4-6, 9-12 and 14-17 is respectfully traversed.

Kuwata does not teach or suggest every feature of claims 1, 4-6, 9-12 and 14-17. Kuwata does not disclose "the coefficient holding device holding only the correction coefficients corresponding to one of the specific curve pattern portions in the combination portion, and the correction device including a device to generate correction coefficients corresponding to the combination portion based on the correction coefficients corresponding to the specific curve pattern portion," as recited in amended independent claim 1, and as similarly recited in independent claim 9 (emphasis added). Further, Kuwata does not disclose "the holding the correction coefficients holding only the correction coefficients corresponding to one of the specific curve pattern portions in the combination portion, and the performing the grayscale correction including generating correction coefficients corresponding to the combination portion based on the correction coefficients corresponding to the specific curve

pattern portion," as recited in amended independent claim 14, and as similarly recited in independent claim 15 (emphasis added). Furthermore, Kuwata does not disclose "the instructions to hold the correction coefficients holding only the correction coefficients corresponding to one of the specific curve pattern portions in the combination portion, and the instructions to perform the grayscale correction including instructions to generate correction coefficients corresponding to the combination portion based on the correction coefficients corresponding to the specific curve pattern portion," as recited in amended independent claim 16, and as similarly recited in independent claim 17 (emphasis added).

With respect to the rejection to claim 2, the Office Action asserts that Kuwata discloses the claimed "coefficient holding device" at Fig. 25 because it shows that "coefficients are held for $yq1$ and $yq3$, corresponding to the 'sole-cord S curve'." Further, the Office Action, referring to paragraph [0107] of Kuwata, asserts that Kuwata discloses the claimed correction device. (See Office Action, page 3.) These assertions are respectfully traversed.

As discussed during the personal interview, Kuwata merely discloses that "small number of gradations is assigned to the small range of distribution density," and "many numbers of gradation" are assigned to "the large range of distribution density," (see Kuwata, paragraph [0096]). Contrary to the Office Action's assertions, Fig. 25 of Kuwata shows an entire correction curve from 0-255. According to Fig. 25, the curve portions 0- y_{mid} and y_{mid} -255 represent the same curve pattern. Accordingly, the correction coefficients $yq1$ and $yq3$ of Kuwata that are held are of the entire curve pattern. Thus, Kuwata does not disclose "holding only the correction coefficients corresponding to one of the specific curve pattern portions in the combination portion, as recited in independent claims 1, 9 and 14-17.

Further, Kuwata, at paragraph [0107], merely discloses that a specific brightness value can be obtained after the conversion of all the brightness values. According to paragraph

[0107] of Kuwata, all the possible values are stored in a table. Kuwata does not disclose a table that is obtained based on correction coefficients corresponding to only the specific curve pattern portion. Thus, Kuwata does not disclose the generation of "correction coefficients corresponding to the combination portion based on the correction coefficients corresponding to the specific curve pattern portion," as recited in independent claims 1, 9, and 14-17.

Thus, for at least these reasons, independent claims 1, 9 and 14-17 are patentable over Kuwata. Further, claims 4-6 and 10-12, which variously depend from independent claims 1 and 9 also are patentable over Kuwata for at least the reasons discussed above with respect to independent claims 1 and 9, as well as for the additional features they recite. Withdrawal of the rejection is thus respectfully requested.

B. §102(b) Rejection of Claims 1 and 3

Claims 1 and 3 are rejected under 35 U.S.C. §102(b) over U.S. Patent No. 6,046,820 to Konishi ("Konishi"). The rejection is respectfully traversed.

Konishi does not teach or suggest every feature of claims 1 and 3. Konishi does not disclose the "coefficient holding device holding only the correction coefficients corresponding to one of the specific curve pattern portions in the combination portion, and the correction device including a device to generate correction coefficients corresponding to the combination portion based on the correction coefficients corresponding to the specific curve pattern portion," as recited in amended independent claim 1.

Applicant notes that these features were recited in original claim 2, and claim 2 is not rejected by the Office Action over Konishi. Further, Konishi merely discloses a method of correcting the tonality of image formation by utilizing a computer generated gray scale correction table (see Konishi, col. 4, lines 40-64). Fig. 2 of Konishi merely shows a plurality of curves that show the relationship between an input density value and an output density value in a printer (see Konishi, col. 2, lines 43-46). The Office Action acknowledges that Fig.

2 shows "the curve corresponds to the entire range," (see Office Action, page 7). Therefore, Konishi does not disclose "the coefficient holding device holding only the correction coefficients corresponding to one of the specific curve pattern portions in the combination portion," as recited in amended independent claim 1.

Thus, for at least these reasons, independent claim 1 is patentable over Konishi. Further, claim 3, which depends from claim 1, is also patentable over Konishi for at least the reasons discussed above with respect to independent claim 1, as well as for the additional features it recites. Withdrawal of the rejection is thus respectfully requested.

C. §103(a) Rejection of Claim 7 over Kuwata, Maeda and Udagawa

Claim 7 is rejected under 35 U.S.C. §103(a) over Kuwata, U.S. Patent No. 5,872,643 to Maeda et al. ("Maeda") and U.S. Patent No. 4,908,701 to Udagawa ("Udagawa"). The rejection is respectfully traversed.

Kuwata, Maeda and Udagawa, alone or in a permissible combination, do not teach or suggest every feature of claim 7. As discussed above, Kuwata does not teach or suggest every feature of amended independent claim 1. Further, Maeda and Udagawa do not remedy the deficiencies of Kuwata. Maeda is cited by the Office Action for only its alleged teaching of a device that performs "both luminance correction and color correction." Udagawa is cited by the Office Action for only its alleged teaching of "color difference correction."

Thus, for at least these reasons, claim 7 is patentable over Kuwata, Maeda and Udagawa for at least the reasons discussed above with respect to independent claim 1, as well as for the additional feature it recites. Withdrawal of the rejection is thus respectfully requested.

D. **§103(a) Rejection of Claims 8 and 13 over Kuwata, Maeda, Udagawa and Main**

Claims 8 and 13 are rejected under 35 U.S.C. §103(a) over Kuwata, Maeda, Udagawa and U.S. Patent No. 5,408,267 to Main ("Main"). The rejection is respectfully traversed.

Kuwata, Maeda, Udagawa and Main, alone or in a permissible combination, do not teach or suggest every feature of claims 8 and 13. As discussed above, Kuwata, Maeda and Udagawa do not teach or suggest every feature of amended independent claims 1 and 9. Further, Main does not remedy the deficiencies of Kuwata, Maeda and Udagawa. Main is cited by the Office Action for only its alleged teaching of "the correction device simultaneously performs the luminance correction and the color difference correction by time-divisionally referring to the coefficient holding device."

Thus, for at least these reasons, claims 8 and 13, which variously depend from independent claims 1 and 9 and are patentable over Kuwata, Maeda, Udagawa and Main for at least the reasons discussed above with respect to independent claim 1 and 12, as well as for additional features they recite. Withdrawal of the rejection is thus respectfully requested.

II. **Conclusion**

In view of the foregoing, it is respectfully submitted that this application is in condition for allowance. Favorable reconsideration and prompt allowance of the claims are earnestly solicited.

Should the Examiner believe that anything further would be desirable in order to place this application in even better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number set forth below.

Respectfully submitted,



James A. Oliff
Registration No. 27,075

Randi B. Isaacs
Registration No. 56,046

JAO:PQWmrh

Date: December 12, 2007

OLIFF & BERRIDGE, PLC
P.O. Box 320850
Alexandria, Virginia 22320-4850
Telephone: (703) 836-6400

<p>DEPOSIT ACCOUNT USE AUTHORIZATION Please grant any extension necessary for entry; Charge any fee due to our Deposit Account No. 15-0461</p>
--